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*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the lead case,
No. 19-30088(DM)*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11
(Lead Case)
(Jointly Administered)

**SUPPLEMENTAL DECLARATION OF
SAMUEL E. STAR IN CONNECTION
WITH THE RETENTION AND
EMPLOYMENT OF FTI CONSULTING,
INC. AS FINANCIAL ADVISOR TO THE
OFFICIAL COMMITTEE OF
UNSECURED CREDITORS *NUNC PRO
TUNC* TO FEBRUARY 12, 2019**

Re: Dkt. No. 2252

1 I, Samuel E. Star, pursuant to 28 U.S.C. § 1746, to the best of my knowledge and belief, and
2 after reasonable inquiry, declare that the following is true and correct:

3 I am a Senior Managing Director of FTI Consulting, Inc. (together with its wholly owned
4 subsidiaries, contractors and employees, “**FTI**”), an independent global business advisory firm and I
5 am duly authorized to make this supplemental declaration (the “**Supplemental Declaration**”) on behalf
6 of FTI.

7
8 On April 3, 2019, the Official Committee of Unsecured Creditors (the “**Committee**”) in these
9 chapter 11 cases (the “**Chapter 11 Cases**”) of the above-captioned debtors and debtors-in-possession
10 (collectively, the “**Debtors**”) submitted the *Application of the Official Committee of Unsecured*
11 *Creditors for Entry of an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R. Bankr.*
12 *P. 2014(a) for Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisors Nunc*
13 *Pro Tunc to February 12, 2019* [Dkt. No. 1212] (the “**Application**”).¹ Attached to the Application as
14 Exhibit B was the *Declaration of Samuel E. Star in Support of Application of the Official Committee of*
15 *Unsecured Creditors for Entry of an Order Pursuant to 11 U.S.C. §§ 328(a) and 1103 and Fed. R.*
16 *Bankr. P. 2014(a) for Authorization to Retain and Employ FTI Consulting, Inc. as Financial Advisor*
17 *Nunc Pro Tunc to February 12, 2019* (the “**Star Declaration**”). The Star Declaration was submitted in
18 support of the Application to, among other things, provide disclosures pursuant to title 11 of the United
19 States Code §§ 101 et seq. (the “**Bankruptcy Code**”), the Federal Rules of Bankruptcy Procedure (the
20 “**Bankruptcy Rules**”) and the Bankruptcy Local Rules for the United States Bankruptcy Court for the
21 Northern District of California (the “**Local Rules**”).
22
23

24 I am submitting this Supplemental Declaration in connection with FTI’s retention to, among
25 other things, provide additional disclosures pursuant to the Bankruptcy Code, the Bankruptcy Rules, and
26 the Local Rules. Except as otherwise set forth herein, the Star Declaration is expressly incorporated
27

28 ¹ Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them
in the Application.

1 herein. Unless otherwise stated in this Supplemental Declaration, I generally have personal knowledge
2 of the matters set forth herein and, if called as a witness, I would competently testify thereto.²

3 **SUPPLEMENTAL DECLARATION**

4 1. Subsequent to the filing of the Star Declaration, FTI received an expanded list of parties
5 in interest from the Debtors. Attached hereto as **Schedule A** is a list of any relationship between FTI
6 and any additional actual or potential parties-in-interest (collectively, the “**Potential Parties-in-**
7 **Interest**”) that have been subsequently identified by the Debtors in the Chapter 11 Cases. FTI
8 compared the names of each of these additional Potential Parties-in-Interest to the names contained in
9 a database maintained by FTI of current and former clients and other relationships.
10

11 2. Based on all of the foregoing, to the best of my knowledge and except as otherwise
12 noted, FTI does not represent any entity having an adverse interest in connection with these cases, and
13 therefore believes it continues to be eligible to represent the Committee. It is FTI’s policy and intent
14 to update and expand its ongoing relationship search for additional parties in interest in an expedient
15 manner. To the extent FTI discovers any new material relevant facts bearing on the matters described
16 herein during the period of FTI’s employment, FTI will amend and supplement the information
17 contained in this Supplemental Declaration to disclose any additional facts and will promptly file a
18 further supplemental declaration pursuant to Bankruptcy Rule 2014(a).
19

20 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and
21 correct to the best of my knowledge and belief.
22

23 Dated: July 2, 2019
24 New York, NY

Respectfully submitted,

25 By: /s/ Samuel E. Star
26 Samuel E. Star
27 Senior Managing Director

28 ² Certain of the disclosures set forth herein relate to matters within the knowledge of other
employees at FTI and are based on information provided by them.

Schedule A

**(Relationships With Potential Parties in Interest
Supplemental Declaration)**

Entity with which FTI has a connection	Nature of connection
Accenture	Accenture is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Akin, Gump, Strauss Hauer & Feld	Akin, Gump, Strauss Hauer & Feld is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Akin, Gump, Strauss Hauer & Feld	Akin, Gump, Strauss Hauer & Feld is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
ARB	ARB is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Baker & Hostetler	Baker & Hostetler is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Deutsche Bank National Trust Company and Deutsche Bank Trust Company Americas	Deutsche Bank National Trust Company and Deutsche Bank Trust Company Americas is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Granite Construction Incorporated	Granite Construction Incorporated is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Itron	Itron is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
KPMG	KPMG is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
McKinsey	McKinsey is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Milbank, Tweed, Hadley & McCloy	Milbank, Tweed, Hadley & McCloy is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
NextEra Energy	NextEra Energy is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Sodexo	Sodexo is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
State Farm Mutual Automobile Insurance Company	State Farm Mutual Automobile Insurance Company is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
TALX	TALX is a former client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Travelers Insurance	Travelers Insurance is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.

Entity with which FTI has a connection	Nature of connection
Willis Towers Watson US	Willis Towers Watson US is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Willkie Farr & Gallagher	Willkie Farr & Gallagher is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.
Wilson Sonsini	Wilson Sonsini is a current client of one or more business units of FTI in matters unrelated to the Debtors and these Chapter 11 Cases.